

EXHIBIT “J”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
TERESA MCCOY,

PLAINTIFF,

-against- 21 CV 04907 (VEC)

THE TJX COMPANIES, INC.,

DEFENDANT.

-----X

DATE: April 25, 2022

TIME: 10:04 A.M.

DEPOSITION of the Defendant, TJX
COMPANIES, INC., by a witness, JAMIE PENNA,
taken by the Plaintiff, pursuant to a Notice
and to the Federal Rules of Civil Procedure,
held at the reported date and time, before
Germila Donald, a Notary Public of the State
of New York.

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A P P E A R A N C E S:

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BY: MARY C. AZZARETTO, ESQ.

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F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by
and between the counsel for the respective
parties herein that the sealing, filing and
certification of the within deposition be
waived; that the original of the deposition
may be signed and sworn to by the witness
before anyone authorized to administer an
oath, with the same effect as if signed
before a Judge of the Court; that an
unsigned copy of the deposition may be used
with the same force and effect as if signed
by the witness, 30 days after service of the
original & 1 copy of same upon counsel for
the witness.

IT IS FURTHER STIPULATED AND AGREED
that all objections except as to form, are
reserved to the time of trial.

* * * *

1 J. PENNA

2 J A M I E P E N N A, called as a witness,
3 having been first duly sworn by a Notary
4 Public of the State of New York, was
5 examined and testified as follows:

6 EXAMINATION BY

7 MR. O'NEILL:

8 Q. Please state your name for the
9 record.

10 A. Jamie Penna.

11 Q. Where is your place of business?

12 A. The store is at 795 Columbus
13 Avenue, New York, New York 10025.

14 MS. AZZARETTO: I just want to put
15 a statement on the record that the
16 witness reserves her right to make
17 changes to the transcript, please.

18 MR. O'NEILL: Okay, noted.

19 Q. Good morning, is it Ms. Penna?

20 A. Yes.

21 Q. How are you?

22 A. Pretty good. And yourself?

23 Q. I'm trying, thanks. Have you ever
24 been deposed before?

25 A. Not that I recall. First time.

1 J. PENNA

2 Q. I am sorry?

3 A. No, I have not.

4 Q. I'm sure your lawyer went over the
5 rules with you. I think the most important
6 thing is to remember that we have a
7 reporter whose job it is to take down
8 everything that we say. And she can only do
9 that properly if only one person talks at a
10 time. Sometimes it will be very obvious
11 what my question is before I finish it, but
12 please let me finish so that the
13 reporter can get it down and then get your
14 answer properly as well.

15 If you want to take a break at any
16 time let me know. If you have any questions
17 about the process, you can ask me or you can
18 take a break and ask your lawyer. You can
19 take a break at any time you want as long as
20 you finish answering whatever question that
21 I have asked. So are you ready to begin?

22 A. Yes.

23 Q. What is your position or title?

24 A. Store manager.

25 Q. For whom?

1 J. PENNA

2 A. HomeGoods.

3 Q. A what store are you a manager of?

4 A. I'm in HomeGoods in the Upper West
5 Side 795 Columbus Avenue.

6 Q. Is that the location of the
7 incident in this lawsuit?

8 A. That's correct.

9 Q. How long have you been a store
10 manager there?

11 A. It was three years now.

12 Q. How long have you been employed by
13 by HomeGoods?

14 A. TJX Companies, nineteen years.

15 Q. Nineteen years?

16 A. Yes.

17 Q. And before you were the store
18 manager of your current store, what was your
19 job or position?

20 A. Still store manager, different
21 location.

22 Q. Could you tell me?

23 MS. AZZARETTO: She said store
24 manager different location.

25 Q. How long have you been a store

1 J. PENNA

2 manager?

3 A. I would say ten years now.

4 Q. Okay. Do you have anything other
5 than an iPhone to use to connect to this
6 deposition?

7 A. No, I do not.

8 MR. O'NEILL: It is very
9 difficult.

10 Q. Do you understand that you have
11 been designated by TJX Companies to be a
12 witness in this case?

13 A. Yes, I do.

14 Q. And do you understand that there
15 are certain areas that you had been
16 designated to testify about?

17 A. Yes, I am aware.

18 Q. What have you done to prepare to
19 testify with respect to those subject
20 matters?

21 A. Other than?

22 MS. AZZARETTO: Other than with
23 conversation with Counsel.

24 MR. O'NEILL: Right. I don't want
25 to know anything about what you spoke

1 J. PENNA

2 about to your counsel.

3 A. Nothing else. I brought myself
4 according to what we do everyday as a
5 company. I have been with the company for a
6 long time. Other than that I have not done
7 anything other than that.

8 Q. Mm-hmm. Let us take each the
9 subject matter one by one. Were you shown
10 the deposition notice that lists the subject
11 matters?

12 MR. O'NEILL: I have shown the
13 witness Exhibit 5, which is the March
14 11, 2022 deposition notice for this
15 deposition.

16 Q. Ms. Penna, have you seen this
17 document before?

18 A. We talked about the event, yes.

19 MS. AZZARETTO: He does not want
20 to know what we talked about. He just
21 wants to know if you saw that actual
22 document.

23 A. No. I did not.

24 Q. Were you given a list of subject
25 matters in writing by anybody?

1 J. PENNA

2 A. Not --

3 MS. AZZARETTO: Just yes or no.

4 A. No.

5 Q. How were you informed as to what
6 subject matters you would be testifying
7 about?

8 MS. AZZARETTO: Note my objection
9 to any reference of conversation
10 between the witness and myself.

11 MR. O'NEILL: If she tells me if
12 that is how she learned.

13 MS. AZZARETTO: You are allowed to
14 tell him if that is how you learned
15 about the subject matter. Just do not
16 tell him anything about what we
17 discussed Jaime.

18 Q. Do you understand what I am asking
19 you?

20 A. Besides -- so I know about the
21 event, obviously what happened.

22 Q. How do you know about the event?

23 MS. AZZARETTO: Again, note my
24 objection. He just wants to know did
25 you prepare for the subject matter of

1 J. PENNA

2 this deposition based on the
3 conversations between myself and you.

4 A. No.

5 Q. My question is, how do you know
6 about the event?

7 A. Because they told me that I would
8 testify.

9 Q. Okay.

10 MS. AZZARETTO: Note my objection.

11 Q. Were you there at the store when
12 Ms. McCoy fell down?

13 A. I was not at this location yet.
14 But I did work for the company.

15 MR. O'NEILL: Can you read the
16 answer back. I am having a hard time
17 understanding.

18 (Whereupon, the referred-to
19 question and answer was read back by
20 the Certified Stenographer.)

21 Q. So the first subject matter that
22 you testified to is the location of the
23 video cameras in the store. Are you able to
24 testify to with respect to that?

25 A. The location of the cameras is

1 J. PENNA

2 something usually handled by the lost and
3 prevention department, but yes, I just know
4 that yes it is a system that is running.
5 And I don't know if it captures depending on
6 where the cameras are located. I don't
7 know. I have no idea where the cameras are
8 located 100 percent, unless the visible
9 ones.

10 MS. AZZARETTO: He is asking
11 specific question. He wants to know if
12 you can testifying today regarding the
13 topic of the location of the video
14 cameras in the store.

15 A. I do not have information about
16 cameras.

17 Q. Okay. So you can not testify to
18 subject matter number one; is that correct?

19 A. That's correct.

20 Q. Okay. Subject matter two is the
21 maintenance availability or disposition of
22 videos from the store cameras taken on the
23 day of the occurrence. Do you have any
24 information with respect to that subject
25 matter?

1 J. PENNA

2 A. I do not.

3 Q. Number three is the store's
4 routine for conducting daily safety
5 inspections or sweeps. Do you have any
6 information with respect to that subject
7 matter?

8 A. Yes, daily routines are recovery
9 happens on the day. Ask the associates to
10 put goods on the shelf, so throughout the
11 day we do have recovery throughout the day.
12 And what it means by that is making sure
13 that we pick up stuff off the floor and put
14 it back where it belongs.

15 Q. Is there say schedule for making
16 safety inspections or sweeps.

17 A. No, we have this -- no, there is
18 no notation on the paper or checklist for
19 that. It happens to be something that is a
20 regular routine.

21 Q. What do you mean by regular
22 routine?

23 A. Something that happens throughout
24 the day, daily.

25 Q. It happens daily. Is that what

1 J. PENNA

2 you said?

3 A. Throughout the day.

4 Q. How many times throughout the day?

5 A. There is no count. Unless they
6 are assigned by area. Circle around
7 according to what they are doing during the
8 day, putting stuff away. But it is
9 throughout the day. There is no count
10 noted. It is done as need.

11 Q. You said done as needed?

12 A. Yes.

13 Q. And how do you determine if it is
14 needed?

15 A. According to the condition on the
16 floor. Anything obviously out of place put
17 it where it belongs. The associate puts it
18 back where it belongs.

19 Q. Isn't that the purpose of a safety
20 sweep to see if there is something out of
21 place where it does not belong?

22 A. That's correct. It happens
23 throughout the day.

24 Q. But if the purpose of the safety
25 sweep is to see what isn't in place and you

1 J. PENNA

2 say it is done as need when somebody sees
3 that it is out of place, it seems kind of
4 circular to me. Do you understand my
5 confusion?

6 MS. AZZARETTO: If you do, if not
7 just tell him.

8 MR. O'NEILL: Mary, I don't need
9 the interruptions really. Everything
10 is if she knows.

11 MS. AZZARETTO: It is not an
12 interruption.

13 MR. O'NEILL: It is an
14 interruption. It is not an objection.
15 It is an instruction and I don't want
16 that.

17 MS. AZZARETTO: The question is
18 not clear and I want to make sure she
19 understands.

20 MR. O'NEILL: She can tell me if
21 she does not understand. Don't.

22 The question was, does she
23 understand the question. I don't know
24 how that it is unclear.

25 MS. AZZARETTO: She can answer. I

1 J. PENNA

2 want to make sure she understands. She
3 should only be answering if she
4 understands.

5 MR. O'NEILL: That goes for every
6 question you want to need to highlight
7 that.

8 MS. AZZARETTO: Sometimes the
9 witness needs to be reminded.

10 A. I don't understand the confusion.
11 It is what we do on a daily basis. The team
12 is on a routine.

13 Q. How many documents generated as a
14 result of this safety sweeps?

15 A. No.

16 Q. How do you know if the safety
17 sweep has been done?

18 A. Because the manager inspected the
19 area. So it is organized. Every area has a
20 supervisor. Throughout the day somebody is
21 in charge. And they respond to putting the
22 goods out there and making sure throughout
23 the day recover after doing what they are
24 doing.

25 Q. Can you explain that in a little

1 J. PENNA

2 more detail please?

3 A. Okay. Every area of the store has
4 a supervisor that is responsible for the
5 standard of the departments of the area of
6 the store throughout day before they shift
7 ends. That is what they do. So they go
8 around making sure they merchandise and they
9 recover the area throughout the day.

10 When that person leaves someone
11 else takes over one of the part-times as
12 well.

13 Q. Well, you are saying that the
14 manager goes and inspects when the shift
15 ends?

16 A. Yes.

17 Q. What are the shifts?

18 A. They are different shifts. So we
19 have opening manager, we have closing
20 manager, mid-manager. They recover the
21 store.

22 Q. I thought you said there was a
23 supervisor for every section of the store?

24 A. Yes. They are called
25 coordinators. So the managers we have are

1 J. PENNA

2 coordinators, actually supervisors of the
3 areas in the store.

4 Q. What is the area where my client
5 fell, what area is that called?

6 A. According to what I know about the
7 case, it was the big ticket area or
8 furniture area.

9 Q. There was a supervisor for that
10 area I take it?

11 A. Yes, every area has a supervisor.

12 Q. So the supervisor for the
13 furniture area, would that person have any
14 other area that he or she would be
15 responsible for?

16 A. Just that area of furniture
17 includes the furniture and rugs. So that
18 part of the store.

19 Q. So you said furniture, what was
20 the other word you used?

21 A. The other furniture include the
22 four mirrors and area rugs.

23 Q. How big is that area?

24 A. I would say no more than -- all
25 combined. Not that it would not be no more

1 J. PENNA

2 than ten feet combined I would say.

3 Q. You said ten feet?

4 A. Yes, I would not know like
5 measurement. In square feet, but it is not
6 a big area.

7 Q. So when you say ten feet you mean
8 like ten feet long and ten feet wide?

9 A. Around, yes.

10 Q. And would the supervisor be in
11 that area all the time?

12 A. Throughout his shift, yes. And
13 when the person goes somewhere else,
14 somebody else covers all the time.

15 Q. Would there be anybody else
16 working in that area other than the
17 supervisor?

18 A. Yes.

19 Q. And strictly in that area?

20 A. Yes.

21 Q. And how many other people would be
22 working in that area?

23 A. A lot of older people. According
24 to how busy the store is. That requires
25 carryout which is bringing merchandise

1 J. PENNA

2 outside for the customer as well.

3 Q. The people carrying merchandise
4 would not be there all the time, would they?

5 A. At that point in time if somebody
6 was actually doing a carryout at that point
7 in time they had a second person, I'm not
8 sure. I know we do have coverage for two
9 people depending on how busy we are.

10 Q. So at any given time in this
11 furniture area that you have described,
12 there would be at least two people at any
13 given time?

14 A. At least not an even time, so I
15 would say the weekend is always.

16 Q. Are you including the supervisor
17 in that count?

18 A. Yes.

19 Q. So there would be at least the
20 supervisor and one other person at any given
21 time?

22 A. Yes.

23 Q. So category number six is the
24 staffing or provisions of security guards at
25 the store on date of the occurrence. Can

1 J. PENNA

2 you testify with respect to that subject
3 matter?

4 A. Not -- that is a different
5 requirement. I'm not aware of there might
6 have been or not been in the store at that
7 point in time. So I will say it is a
8 different department. So I would say no.

9 Q. What department handles security
10 guards?

11 A. That is the lost prevention
12 department.

13 MS. AZZARETTO: Let us take a
14 break for a couple minutes, okay. I
15 need a three-minute break and we will
16 be right back, okay.

17 (Whereupon, an off-the-record
18 discussion was held.)

19 MR. O'NEILL: Back on the record.

20 Q. Ms. Penna, while we were on the
21 break your attorney said there was some
22 confusion about my questions about the
23 security cameras; is that correct?

24 A. Yes.

25 Q. What was the confusion or

1 J. PENNA

2 misunderstanding?

3 A. About the department itself.

4 Because it is a different department. Yes,

5 I do know the general -- probably go about

6 the day when it comes to that department,

7 but I don't -- I can't answer questions like

8 factual about where is this or the other

9 because I do not know, but yes I do know the

10 general about the lost prevention

11 department. Yes, I do testify about the

12 general when it comes to that department.

13 Q. Can you testify as to how many

14 security cameras or how many cameras are in

15 the store at all?

16 A. I can testify yes, there are

17 cameras, but I do not have a count.

18 Q. Do you know where the cameras are?

19 A. Yes. The store pertaining to the

20 area in question, yes, there are cameras

21 back there. Do I know if they that day

22 capture where the event happened, I don't

23 have that answer. But yes, there are

24 cameras in all areas of the store.

25 Q. When you say there are cameras in

1 J. PENNA

2 the areas where the event happened, what are
3 you referring to?

4 A. Well, we do know that the event
5 happened what we call the furniture area.
6 There are cameras all over the sales floor
7 when it come to lost prevention. So that I
8 know. So there are cameras around the sales
9 floor.

10 Q. That store has two levels,
11 correct?

12 A. Yes.

13 Q. Is the furniture area on the
14 ground floor or is it in the basement level?

15 A. The main department which is
16 downstairs, but they to feature furniture
17 upstairs as well.

18 Q. Where is it that you understand
19 that the event took place?

20 A. All I know from records is it is
21 close to the furniture department.

22 Q. On the ground floor or in the
23 basement?

24 A. In the basement.

25 Q. When you first walk into the store

1 J. PENNA

2 there is an aisle; is that correct?

3 A. There is an aisle on the main
4 floor upstairs we are referring. So we do
5 have merchandise to the left and to the
6 right, yes.

7 Q. What is that area called?

8 A. It is called the accessory
9 department.

10 Q. Is there a supervisor for that
11 area?

12 A. There is actually a supervisor for
13 every area, yes.

14 Q. How large is that area?

15 A. I would say about 19 feet probably
16 I want to say.

17 Q. So 19 feet long?

18 A. Yes, because it is on the wall.
19 Whatever accessory and merchandise it is, it
20 is on the wall.

21 Q. And the supervisor for that area,
22 does he or she have any other areas that he
23 or she is responsible for?

24 A. Yes. Usually around the same
25 perimeter upstairs.

1 J. PENNA

2 Q. What does that mean?

3 A. Around the same area not far from.

4 They have different areas, yes. That is
5 according to the home decor.

6 Q. Would the supervisor -- could we
7 call that the accessory area?

8 A. Upstairs, yes.

9 Q. Would the supervisor for the
10 accessory area be able to see the entire
11 area?

12 A. Yes. It is in plain sight, yes.

13 Q. And that supervisor would be in
14 that area for his or her entire shift; is
15 that correct?

16 A. Throughout the day, yes.

17 Q. And would there be anybody else
18 working in that area?

19 A. It could be at times helping out
20 or having a break, yes.

21 Q. So at any given time, how many
22 people store employees would be in that
23 area?

24 A. Throughout the day from the
25 supervisor to the part-timers, it could be

1 J. PENNA

2 many. I would say up to five depending.

3 Q. Okay.

4 A. Depending on the coverage.

5 Q. If any of these employees saw
6 something out of place, would it be the
7 employees duty to fix it?

8 A. Yes. And to put it away.

9 Q. Are you able to tell me where the
10 video cameras are on the first floor are
11 located?

12 A. There is one by the entrance that
13 I recall. I think I know there is a monitor
14 that picks up the motions. And a camera by
15 the entrance. And the count specifically I
16 don't have the count, but on the top floor
17 there should be about two or three.

18 Q. Would they cover all of the sales
19 floors?

20 A. Yes.

21 Q. And what happened to the videos
22 that are recorded?

23 A. Like I said, I do not have no
24 access to that that. It is a different
25 department. I do know that -- the only

1 J. PENNA

2 thing I know is that there comes a report
3 now. Do they have footage of whatever
4 happened of the incident that day, I'm not
5 sure. The cameras actually moved as well.
6 So they have recording different places of
7 the store. They might change positions, if
8 I may say. They rotate. So they stay fixed
9 in one area. They might be recording the
10 front. And at one point it might switch
11 back and record the side or vice versa.

12 Q. When you say they move, you mean
13 the cameras takes a sweep of different
14 areas?

15 A. Yes.

16 Q. And how long does it take to go
17 from one end to the other end?

18 A. I do not have that information.

19 Q. My question is, the cameras
20 record, correct?

21 A. That's correct. They should be
22 recording.

23 Q. And these are digital recordings
24 on some sort of computer hard drive?

25 A. I suppose, yes.

1 J. PENNA

2 Q. And what happens to those
3 recordings?

4 A. I do not have that information.
5 No. It might be -- I'm not sure. It might
6 happen same day recording, I don't know,
7 after a period of time. That is probably
8 disposed from the system itself. I'm not
9 sure. I don't have the complete answer, but
10 I know it continues to recycle and record.
11 That is all I know.

12 Q. Who would be able to answer that
13 question?

14 A. That would be the lost prevention
15 department. It has nothing to do with the
16 store.

17 Q. You say the lost prevention
18 department has nothing to do with the store?

19 A. No, I said it has nothing to do
20 with management. We do not manage the
21 cameras.

22 Q. Well, I understand that. If I
23 needed to have this question answered about
24 what happens to the recordings, how long
25 they are kept, where are they kept, that

1 J. PENNA

2 would be the lost prevention department; is
3 that correct?

4 A. That's correct.

5 Q. And you didn't talk to them to get
6 answers to those question; is that correct?

7 A. No, I did not.

8 Q. Who would be able to answer
9 questions about the staffing of security
10 guards at the store?

11 A. I know what we do on a daily basis
12 when it comes to support from that
13 department. I can speak on the general
14 coverage.

15 Q. I am not sure I heard.

16 MS. AZZARETTO: Respeak your
17 answer.

18 A. I can testify when it comes to the
19 coverage that they actually give the store.

20 Q. What do you mean by that?

21 A. The work specifically -- they work
22 for HomeGoods, but not for a management
23 team. But I can speak to the general
24 position and when it comes to their schedule
25 whether they work.

1 J. PENNA

2 Q. Could you tell me what the
3 schedule for security guards is, is that
4 what you are saying?

5 A. When it comes to the support
6 usually the coverage support to the store
7 when it comes to coverage.

8 Q. You are using terms and I'm not
9 sure I understand properly. When you say
10 support, what do you mean?

11 A. We all support coverage, the
12 coverage in the store.

13 Q. Just the presence of the security
14 guard that is what you mean by support?

15 A. Exactly, yes.

16 Q. My question is a little bit
17 different I suppose.

18 Obviously when there is a security
19 guard in the store, somebody knows who that
20 security guard is, correct?

21 A. At that point in time, yes. Every
22 day.

23 Q. Who would know that?

24 A. The management team is usually
25 aware are of who is covering.

1 J. PENNA

2 Q. Aware of what?

3 A. The management team should know
4 who they have for coverage.

5 Q. Are these employees of HomeGoods
6 TJX?

7 A. They are employees of TJX
8 Companies, yes.

9 Q. TJX?

10 A. Yes, TJX company.

11 Q. So the security guards are
12 actually employed by TJX Company?

13 A. The lost prevention department,
14 yes.

15 Q. So they would have employment
16 records that would indicate who was employed
17 as a security guard in the store, correct?

18 A. That is correct.

19 Q. So if you wanted to know who the
20 security guards were on a given day,
21 somebody would be able to give you that
22 information, correct?

23 A. I would say so, yes.

24 Q. Would that be the lost prevention
25 department?

1 J. PENNA

2 A. They are the ones that schedule,
3 so yes.

4 Q. Do you know where the records are
5 or who has the records that would be able to
6 identify the security guard who was working
7 on the first floor when my client fell?

8 A. I don't have -- all I know is the
9 lost prevention department is run by a
10 different department. Not by the store
11 management team. I could talk to the
12 general, the coverage like where do they
13 work, what do they do. But I do not have
14 access to the records.

15 Q. Do you understand that my client
16 fell because a couple of stools were stacked
17 one on top of the other?

18 A. Yes, I'm aware of it.

19 Q. Does the company know who did that
20 stacking?

21 A. We are not aware. It could have
22 happened -- it could be anybody putting it
23 on top of each other. It could have been
24 customers shopping. It could have been
25 anything.

1 J. PENNA

2 Q. And my question is, does the
3 company know who did that?

4 A. Not that I am aware. I don't have
5 that answer.

6 Q. Did you do anything to find out?

7 A. Anything like?

8 Q. Like ask somebody.

9 A. No, I do not have any access to
10 video, anything. I did not ask. I am aware
11 of the event.

12 Q. Who would be responsible for that
13 particular display?

14 A. Whoever was in charge of that
15 point of that area.

16 Q. And it was a supervisor?

17 A. That would be a supervisor, yes.

18 Q. And also the other employees in
19 the area?

20 A. Yes.

21 Q. So they would all have
22 responsibility with respect to that display
23 area?

24 A. That's correct.

25 MR. O'NEILL: I don't have any

1 J. PENNA

2 further questions. Thank you.

3 MS. AZZARETTO: You are done

4 Jaime. Thank you.

5 (Whereupon, at 10:47 A.M., the

6 Examination of this witness was

7 concluded.)

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J. PENNA

D E C L A R A T I O N

I hereby certify that having been first
duly sworn to testify to the truth, I gave
the above testimony.

I FURTHER CERTIFY that the foregoing
transcript is a true and correct transcript
of the testimony given by me at the time and
place specified hereinbefore.

JAMIE PENNA

Subscribed and sworn to before me
this ____ day of _____ 20__.

NOTARY PUBLIC

1 J. PENNA
2 E X H I B I T S

3
4 PLAINTIFF'S EXHIBITS:

5
6 EXHIBIT EXHIBIT
7 NUMBER DESCRIPTION PAGE
8 (None)

9
10 I N D E X

11
12 EXAMINATION BY PAGE
13 MR. O'NEILL 4

14
15
16 INFORMATION AND/OR DOCUMENTS REQUESTED
17 INFORMATION AND/OR DOCUMENTS PAGE
18 (None)

19
20 QUESTIONS MARKED FOR RULINGS

21 PAGE LINE QUESTION
22 (None)

23
24
25

1 J. PENNA
2 C E R T I F I C A T E
3

4 STATE OF NEW YORK)
5 : SS.:
6 COUNTY OF KINGS)

7 I, GERMILA DONALD, a Notary Public for
8 and within the State of New York, do hereby
9 certify:

10 That the witness whose examination is
11 hereinbefore set forth was duly sworn and
12 that such examination is a true record of
13 the testimony given by that witness.

14 I further certify that I am not related
15 to any of the parties to this action by
16 blood or by marriage and that I am in no way
17 interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set
19 my hand this 25th day of April 2022.
20
21

22 
23 GERMILA DONALD
24
25

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